

GUSTAFSON GLUEK, PLLC
DANIEL E. GUSTAFSON (*Pro Hac Vice*)
KARLA M. GLUEK (*Pro Hac Vice*)
RAINIA C. BORRELLI (*Pro Hac Vice*)
Canadian Pacific Plaza
120 South 6th Street, Suite 2600
Minneapolis, MN 55402
Telephone: (612) 333-8844
Facsimile: (612) 339-6622
E-mail: dgustafson@gustafsongluek.com
kgluek@gustafsongluek.com
rborrelli@gustafsongluek.com

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DANIEL ZEIGER and DANZ DOGGIE
DAYTRIPS, Individually and on Behalf of All
Others Similarly Situated.

Plaintiffs,

V.

WELLPET LLC, a Delaware corporation, and
BERWIND CORPORATION, a Pennsylvania
corporation,

Defendant.

Case No. 3:17-cv-04056-WHO

CLASS ACTION

**DECLARATION OF RAINA C.
BORRELLI IN SUPPORT OF
DEFENDANT'S ADMINISTRATIVE
MOTION TO FILE MATERIALS
UNDER SEAL**

I, RAINA C. BORRELLI, declare as follows:

1. I am an attorney with Gustafson Gluek PLLC and represent Plaintiffs in the above-captioned matter. I submit this declaration in support of Defendant's Administrative Motion to File Materials Under Seal, ECF No. 79, related to WellPet's Opposition to Plaintiffs' Motion for Leave to File a Second Amended Complaint, filed under seal and redacting page 6:7-9.

2. Under this Court’s Protective Order, ECF No. 48, parties may identify as “Confidential” information that “is confidential pursuant to applicable law.” Pursuant to Fed. R. Civ. P. 26(b)(4)(D), consulting experts are not subject to discovery except in “exceptional circumstances.” Additionally, under the current schedule, testifying experts do not need to be disclosed at this time. Page 6:7-9, if unredacted, would identify the name of a laboratory that is a consulting expert for Plaintiffs.

3. Therefore, it is proper to file WellPet's Opposition to Plaintiffs' Motion for Leave to File a Second Amended Complaint under seal and redact page 6:7-9, which discloses the identity of Plaintiffs' consulting expert.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 11th day of June 2018.

s/ Raina C. Borrelli
RAINNA C. BORRELLI
Attorney for Plaintiffs